

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CHARLES E. VANCE, DEBTOR**

**CASE NO.: 09-14743**

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**RESPONSE TO MOTION TO ABANDON  
COLLATERAL AND LIFT STAY**

COMES NOW, the debtor and files this his Response tot he Motion to Abandon Collateral and Lift Stay filed by Green Tree Servicing, LLC (hereinafter referred to as "Green Tree"), and responds by like numbered paragraphs as follows:

1. Admitted.
2. Admitted that collateral for the indebtedness is a 1996 Gateway Homes Manufactured Home, but all other allegations of this paragraph are denied.
3. Admitted that Debtor did fall behind in his plan payments, but all other allegations in this paragraph are denied.

Debtor further denies the unnumbered paragraph beginning "WHEREFORE, PREMISES CONSIDERED.

WHEREFORE, debtor prays that on this Motion coming on to be heard the Motion be denied. Debtor prays for such other relief as he may be entitled in the premises.

This the 23<sup>rd</sup> day of September, 2011

/s/ A.E. (Rusty) Harlow, Jr.  
A.E. (Rusty) Harlow, Jr.

**CERTIFICATE OF SERVICE**

I, A.E. (Rusty) Harlow, Jr., attorney for the Debtor, do hereby certify that I have this day

mailed a true and correct copy by United States mail, postage prepaid, a copy of the above and foregoing Response to the following:

Jeff Rawlings  
P.O. Box 1 789  
Madison, MS 39130

Locke D. Barkley  
Chapter 13 Trustee  
P.O. Box 55829  
Jackson, MS 39296

U.S. Trustee  
501 East Court Street, Suite 6-430  
Jackson, MS 39201

This the 23<sup>rd</sup> day of September, 2011.

/s/ A.E. (Rusty) Harlow, Jr.  
A.E. (Rusty) Harlow, Jr.